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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DISABLED PATRIOTS OF AMERICA, INC.,  
a Florida Not-for-Profit Corporation, and  
EFREM WALKER, individually,

Plaintiffs,

vs.

Case No.: 2:06-cv-14574  
Hon. TAYLOR, ANNA DIGGS

JK MANAGEMENT, INC.  
a Michigan Corporation,

Defendant.

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GOREN, GOREN & HARRIS, P.C.  
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MEKANI, OROW, MEKANI,  
SHALLAL, HAKIM & HINDO  
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**DEFENDANT'S ANSWER AND AFFIRMATIVE  
DEFENSES TO PLAINTIFFS' COMPLAINT**

NOW COMES, Defendant by and through its attorneys, MEKANI, OROW,  
MEKANI, SHALLAL, HAKIM & HINDO, and for its Answer to Plaintiffs' Complaint,  
state as follows:

1. Defendant neither admits nor denies the allegations contained therein for  
the reason that Defendant lacks sufficient information or knowledge to form a belief as to

the truth of the allegations contained therein and leaving Plaintiffs to their strict proofs.

2. Defendant neither admits nor denies the allegations contained therein for the reason that Defendant lacks sufficient information or knowledge to form a belief as to the truth of the allegations contained therein and leaving Plaintiffs to their strict proofs.

3. Defendant admits the allegations contained therein.

4. Defendant admits the allegations contained therein.

5. Defendant neither admits nor denies the allegations contained therein for the reason that Defendant lacks sufficient information or knowledge to form a belief as to the truth of the allegations contained therein and leaving Plaintiffs to their strict proofs.

6. Defendant neither admits nor denies the allegations contained therein for the reason that Defendant lacks sufficient information or knowledge to form a belief as to the truth of the allegations contained therein and leaving Plaintiffs to their strict proofs.

7. Defendant neither admits nor denies the allegations contained therein for the reason that Defendant lacks sufficient information or knowledge to form a belief as to the truth of the allegations contained therein and leaving Plaintiffs to their strict proofs.

8. Defendant neither admits nor denies the allegations contained therein for the reason that Defendant lacks sufficient information or knowledge to form a belief as to the truth of the allegations contained therein and leaving Plaintiffs to their strict proofs.

9. Defendant neither admits nor denies the allegations contained therein for the reason that Defendant lacks sufficient information or knowledge to form a belief as to the truth of the allegations contained therein and leaving Plaintiffs to their strict proofs.

10. Defendant neither admits nor denies the allegations contained therein for the reason that Defendant lacks sufficient information or knowledge to form a belief as to

the truth of the allegations contained therein and leaving Plaintiffs to their strict proofs.

11. Defendant neither admits nor denies the allegations contained therein for the reason that Defendant lacks sufficient information or knowledge to form a belief as to the truth of the allegations contained therein and leaving Plaintiffs to their strict proofs for parking, entrance access and path of travel, access to goods and services, and restrooms.

12. Defendant neither admits nor denies the allegations contained therein for the reason that Defendant lacks sufficient information or knowledge to form a belief as to the truth of the allegations contained therein and leaving Plaintiffs to their strict proofs.

13. Defendant neither admits nor denies the allegations contained therein for the reason that Defendant lacks sufficient information or knowledge to form a belief as to the truth of the allegations contained therein and leaving Plaintiffs to their strict proofs.

14. Defendant neither admits nor denies the allegations contained therein for the reason that Defendant lacks sufficient information or knowledge to form a belief as to the truth of the allegations contained therein and leaving Plaintiffs to their strict proofs.

15. Defendant neither admits nor denies the allegations contained therein for the reason that Defendant lacks sufficient information or knowledge to form a belief as to the truth of the allegations contained therein and leaving Plaintiffs to their strict proofs.

16. Defendant neither admits nor denies the allegations contained therein for the reason that Defendant lacks sufficient information or knowledge to form a belief as to the truth of the allegations contained therein and leaving Plaintiffs to their strict proofs.

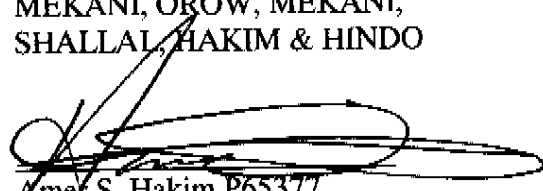
17. Defendant neither admits nor denies the allegations contained therein for the reason that Defendant lacks sufficient information or knowledge to form a belief as to

the truth of the allegations contained therein and leaving Plaintiffs to their strict proofs.

WHEREFORE, Defendant, JK MANAGEMENT, INC., respectfully request that this Honorable Court enter a judgment in its favor, dismissing Plaintiffs' Complaint for no cause of action, and that Defendant be awarded its reasonable costs, expenses and legal fees incurred in defending this litigation.

MEKANI, OROW, MEKANI,  
SHALLAL, HAKIM & HINDO

December 4, 2006



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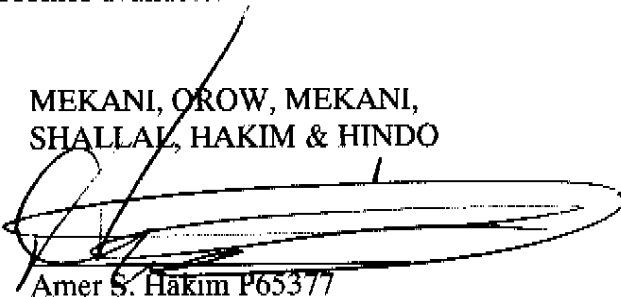
**SPECIAL AND/OR AFFIRMATIVE DEFENSES**

This defendant makes the following affirmative defenses based upon information and belief and reserves the right to file further special and/or affirmative defenses at the conclusion of its investigation and discovery:

1. That the Complaint fails to state a claim upon which recovery could be based.
2. That the process issued in this action against this defendant was insufficient.
3. That the Plaintiff had a duty to mitigate damages and has failed to do so.
4. That if this defendant's facilities were even involved, they complied with any and all federal and state laws, rules, regulations and codes.
5. That if this defendant's facilities were even involved in this incident, then it was manufactured, designed, formulated, developed, warned, and maintained pursuant to generally recognized and prevailing standards at all relevant times.
6. Defendant reserves the right to add, amend, delete or alter these special and/or affirmative defenses during the course of discovery and prior to or during the course of trial in this matter as further information becomes available.

December 4, 2006

MEKANI, OROW, MEKANI,  
SHALLAL, HAKIM & HINDO



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